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February 19, 1992

C-28-92-PVF-241

Mr. Don Ferrier  
EG&G Rocky Flats

SUBJECT: Waste Disposal/Return

Dear Mr. Ferrier:

This letter outlines HALLIBURTON NUS' proposed methods for dealing with Rocky Flats waste. In the absence of authorization from EG&G Rocky Flats to return these wastes, samples and wastes associated with the analyses of these samples have accumulated in the Pittsburgh laboratory in such volumes that they present a safety hazard. Additional receipt of samples from Rocky Flats has been stymied, because the laboratory's NRC license is at maximum capacity. The exigency of this situation is not overstated, as it has essentially put the entire project "on hold". Since we have no immediate authority to return wastes, the following alternatives are proposed:

- All wastewaters generated in the Treatability phase of the project will be disposed of as outlined in my previous letter to you (C-28-91-PVF-1052). This basically states that cleaned up, treated water which meets EPA Drinking Water Standards (5 pCi  $\alpha$ /l, 50 pCi  $\beta$ /l) will be discharged to the sanitary sewer system. This is the crux of the disposal plan for all wastes.
- We propose similar disposition of all liquid wastes from the Characterization phase of the project.
- Unadulterated pond water will be segregated and sent back to RFP for deposit in the pond of origin.
- All other pond water wastes will be treated and disposed of as previously outlined in this letter.
- Wastes which cannot be treated to meet disposal criteria will be sent back to RFP for inclusion in the appropriate process train.

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- All solids and solid residues, associated filters, filter paper, etc. will be properly packaged, returned to RFP, and go to Building 904 for storage. This material will eventually go through the Komar and into the appropriate Pondcrete or Saltcrete process train.
- Solidified waste from the Treatability phase will be sent back to RFP. This will also be incorporated into the Pondcrete or Saltcrete process train as applicable.
- We have already received permission from EG&G to return unadulterated Pondsludge samples.
- "Dry Active" wastes such as gloves, bench liners, etc. will be disposed of through the laboratory's disposal firm for this kind of waste and billed to the project. EG&G has given us permission to do this.

Notwithstanding the above, we recognize that all this liquid waste from all phases of the project can be shipped back to RFP for inclusion into the process train. This could be done via the Komar or deposition into a pond. However, we strongly urge against this due to the additional chance for incident with cross-country shipping, exorbitant cost, and squandering of valuable time.

Ted Bittner and Don Brenneman gave their approval of this letter in my meeting with them this morning. They also requested that you act affirmatively on this by the close of business on Friday, February 21, 1992. With rapid resolution of this paramount issue, I am confident the project will continue as we all had envisioned.

Sincerely,



Paul V. Frank  
Senior Project Manager  
Laboratory Services Group

PVF/ckh

Copy: L. Beer  
T. Bittner  
D. Brenneman  
M. Goldman  
R. Ninesteel  
J. Schmidt

J. Sinanic  
D. Yesso

**HALLIBURTON NUS**  
*Environmental Corporation*